

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Washington Regional Office
County: Bertie
NC Facility ID: 0800102
Inspector's Name: Alicia Mangum
Date of Last Inspection: 08/12/2015
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): East Carolina Regional Solid Waste Landfill</p> <p>Facility Address: East Carolina Regional Solid Waste Landfill 1922 Republican Road Aulander, NC 27805</p> <p>SIC: 4953 / Refuse Systems NAICS: 562212 / Solid Waste Landfill</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: 15A NCAC 02Q .0513 NSPS: N/A NESHAP: N/A PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A</p> <p>Note: Toxic air pollutant regulations were removed in accordance with 15A NCAC 02Q .0702(a)(27)</p>
--	---

Contact Data			Application Data
<p style="text-align: center;">Facility Contact</p> <p>Matt Einsmann, P.E. Environmental Manager (919) 354-3227 5111 Chin Page Road Durham, NC 27703</p>	<p style="text-align: center;">Authorized Contact</p> <p>Drew Isenhour Area President (803) 396-3400 1041 Red Venture Drive, Suite 110 Fort Mill, SC 29707</p>	<p style="text-align: center;">Technical Contact</p> <p>Matt Einsmann, P.E. Environmental Manager (919) 354-3227 5111 Chin Page Road Durham, NC 27703</p>	<p>Application Number: 0800102.16B Date Received: 05/27/2016 Application Type: Renewal Application Schedule: TV-Renewal</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 08849/T07 Existing Permit Issue Date: 04/29/2013 Existing Permit Expiration Date: 02/28/2017</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	3.58	27.03	11.87	111.33	5.00	5.85	2.29 [Hydrogen chloride (hydrochlori]
2013	4.37	31.82	11.39	137.36	6.17	6.28	2.87 [Hydrogen chloride (hydrochlori]
2012	4.12	30.19	10.81	128.09	5.84	3.76	2.65 [Hydrogen chloride (hydrochlori]
2011	3.21	23.81	10.21	93.38	4.27	2.88	1.91 [Hydrogen chloride (hydrochlori]
2010	2.33	18.66	14.93	64.98	3.06	2.84	1.38 [Hydrogen chloride (hydrochlori]

<p>Review Engineer: Lori Ann Phillips</p> <p>Review Engineer's Signature: Date:</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue: 08849/T08 Permit Issue Date: Permit Expiration Date:</p>
---	---

1. Purpose of Application:

East Carolina Regional Solid Waste Landfill has submitted a permit renewal application that was received on May 27, 2016 at the Washington Regional Office (WRO) and on June 2, 2016 at the Raleigh Central Office (RCO). This application was considered complete on the latter date. The facility is located at 1922 Republican Road in Aulander, Bertie County, North Carolina. East Carolina Regional Solid Waste Landfill (East Carolina RSWL) is currently operating under Title V permit 08849T07.

2. Facility Description:

East Carolina RSWL is a municipal solid waste landfill owned and operated by Republic Services of North Carolina, LLC. The landfill is subject to NSPS Subpart WWW and NESHAP Subpart AAAA; therefore, it is required to operate a gas collection and control system to control NMOC emissions and meet several other requirements. The landfill (ES-01) is the only emission source at the facility. Control devices include two candlestick open flares (CD-Flare1 and CD-Flare2). The facility also has a few insignificant emissions sources.

3. Application Chronology:

May 17, 2016	Received zoning consistency determination at RCO.
May 27, 2016	Received permit renewal application at the Washington Regional Office.
June 2, 2016	Received permit renewal application at the RCO. The application package included all necessary forms, authorized signature, and calculations/data.
July 27, 2016	Left a message for Matt Einsmann, Environmental Manager, to inquire about any design capacity increases that may bring NSPS Subpart XXX into play. Subpart XXX is finalized; however, it has not been published in the Federal Register yet.
August 3, 2016	Spoke with Matt Einsmann. The facility has not made a permitted design capacity increase in the last couple of years.

4. New Equipment/Changes in Emissions and Regulatory Review:

New Equipment: There is no new equipment associated with this permit renewal.

Change in Emissions: Estimated fugitive emissions have increased slightly due to an increase of waste-in-place. There are no other changes in emissions.

Regulatory Review: On May 1, 2014, the toxic pollutant exemptions rule, 02Q .0702, was amended. The rule exempts affected sources under Part 63 from being required to obtain a toxics pollutant air permit. Therefore, the permit stipulations for 02D .1100

(Control of Toxic Air Pollutants) and 02Q .0711 (Emission Rates Requiring A Permit) shall be removed from the permit.

The North Carolina Division of Air Quality's air toxics program is a "health risk-based" regulatory program designed to protect the public health by limiting emissions of toxic air pollutants from man-made sources. As of July 19, 2012, emissions of toxic air pollutants have been demonstrated on a facility-wide basis (excluding those sources exempt under 15A NCAC 2Q .0702 "Exemptions"), showing that each of the toxic air pollutants (TAPs) emitted from all sources at the facility are either below its respective toxic permit emission rate (TPER) listed in 15A NCAC 2Q .0711 or the TAPs are in compliance with 15A NCAC 2D .1100. The DAQ has concluded that the toxic air pollutant emissions from this landfill should not present an unacceptable risk to human health based on computer modeling (July 19, 2012) showing the levels of air pollutants below the TPERs.

5. Changes to Permit:

- Updated all dates and permit revision numbers. Changed the name of the department to "Department of Environmental Quality."
- Added the language for permit stipulations 02D .0516 (Sulfur dioxide) and 02D .0521 (Visible emissions) as they appear to have been omitted from the previous version of the permit.
- Removed 02D .1100 and 02Q .0711 from the permit.

6. NSPS, NESHAPS, MACT, PSD, and Attainment Status:

This facility shall remain subject to NSPS Subpart WWW and NESHAPS Subpart AAAA.

Both NSPS Subpart XXX (Standards of Performance for Municipal Solid Waste Landfills that Commenced Construction, Reconstruction, or Modification After July 17, 2014) and Subpart Cf (Emissions Guidelines and Compliance Times for Municipal Solid Waste Landfills) have been published in the Federal Register. According to the facility contact, East Carolina RSWL has not made a permitted design capacity increase to the landfill in the last couple of years. The new Emissions Guidelines will apply to this facility; however, the stipulation for this new rule will not be added to the permit until the rule is effective.

The facility has accepted a CO emission limit of below 250 tons per year by restricting total landfill gas flow through the flares to 2,628,000,000 standard cubic feet. This PSD Avoidance stipulation keeps the facility a PSD minor source.

Bertie County is in attainment for PM₁₀ and ozone.

7. Facility Wide Air Toxics:

This renewal does not result in a toxic emissions increase. Toxic air pollutant permit stipulations were removed from the permit per 15A NCAC 02Q .0702(a)(27).

8. Compliance Status:

The facility was in compliance during the most recent inspection conducted on August 12, 2015 by Alicia Mangum.

9. Facility Emissions Review:

The emissions summary in the table below is based on facility-wide emissions summary submitted by East Carolina RSWL on Form D1. The facility mentioned in their permit application that estimated fugitive emissions have increased slightly due to an increase of waste-in-place.

Facility Emissions Summary

Pollutant	Title V and Expected Actual Emissions (tpy)
TSP	11.15
PM-10	11.15
PM-2.5	11.15
SO₂	20.99
NO_x	45.21
VOC	16.09
CO	246.01
NMOC	41.24

Based on the emissions summary, this facility is correctly classified as a Title V.

10. Other Considerations:

- A P.E. seal is NOT required for this renewal application.
- A zoning consistency determination is required for this application and was received from Bertie County on May 17, 2016.
- This facility is not subject to the 112(r) program as it does not store any of the listed chemicals in quantities above the program thresholds.

11. Public Notice Review:

A 30-day public notice and 45-day EPA review period is required for this permit renewal.

The 30-day public notice period was from XX through XX.

The EPA 45-day review period was from XX through XX.

12. Conclusions, Comments, and Recommendations:

This air permit application for the East Carolina Regional Solid Waste Landfill, located at 1922 Republican Road in Aulander, NC, has been reviewed by DAQ to determine compliance with all procedures and requirements. The Washington Regional Office has made comments on the draft permit. Continued compliance with this air permit is expected. Recommend issuance of revised air permit No. 08849T08.